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**From:** Goodis, Michael [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=50ED0B92DC4945B7A808FE8DBC9224F0-MICHAEL GOODIS]  
**Sent:** 7/8/2019 7:48:13 PM  
**To:** Johnson, Marion [Johnson.Marion@epa.gov]  
**CC:** Davis, Kable [Davis.Kable@epa.gov]; Rosenblatt, Daniel [Rosenblatt.Dan@epa.gov]  
**Subject:** Re: Tolfenpyrad

Ok got it. Thanks.

Sent from my iPhone

On Jul 8, 2019, at 2:29 PM, Johnson, Marion <[Johnson.Marion@epa.gov](mailto:Johnson.Marion@epa.gov)> wrote:

Citrus is already registered on the federal label, except for California. California is trying to work through some ecotox and aquatic concerns, and in doing so, is desiring to add more restrictive and/or additional mitigating language on their proposed state label that doesn't currently exist on the federal label.

MJJ

Marion J. Johnson, Jr.  
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**From:** Goodis, Michael  
**Sent:** Monday, July 8, 2019 2:10 PM  
**To:** Johnson, Marion <[Johnson.Marion@epa.gov](mailto:Johnson.Marion@epa.gov)>  
**Cc:** Davis, Kable <[Davis.Kable@epa.gov](mailto:Davis.Kable@epa.gov)>; Rosenblatt, Daniel <[Rosenblatt.Dan@epa.gov](mailto:Rosenblatt.Dan@epa.gov)>  
**Subject:** RE: Tolfenpyrad

I don't understand how adding citrus to the label would be a restriction though.

Michael L. Goodis, P.E.  
Director, Registration Division (RD)  
Office of Pesticide Programs (OPP)

Phone 703-308-8157  
Room S7623

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**From:** Johnson, Marion  
**Sent:** Monday, July 08, 2019 2:06 PM  
**To:** Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>  
**Cc:** Davis, Kable <[Davis.Kable@epa.gov](mailto:Davis.Kable@epa.gov)>; Rosenblatt, Daniel <[Rosenblatt.Dan@epa.gov](mailto:Rosenblatt.Dan@epa.gov)>  
**Subject:** RE: Tolfenpyrad

Mike,

Bo, Mike, Debra, Briana and I met with CA officials by phone last Tuesday (July 2, 2019) to discuss the issue. Bo mentioned to them that OPP is currently working on a policy document that will re-examine 24C regulation to make state registrations more restrictive in labeling. Because of this, it was suggested to CA that the agency would prefer the addition of citrus use for tolfenpyrad via a separate and distinct Section 3 registration, rather than utilizing the 24(C) option. We are awaiting their final preference to let us know how they would prefer to proceed. We did not pull the 24(c) option from the table, but explained the reasoning behind why the agency prefers the Section 3 option. We hope to hear from them this week on how they will propose to acquire the citrus use.

Marion J.

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**From:** Goodis, Michael  
**Sent:** Monday, July 8, 2019 1:56 PM  
**To:** Johnson, Marion <[Johnson.Marion@epa.gov](mailto:Johnson.Marion@epa.gov)>  
**Cc:** Davis, Kable <[Davis.Kable@epa.gov](mailto:Davis.Kable@epa.gov)>; Rosenblatt, Daniel <[Rosenblatt.Dan@epa.gov](mailto:Rosenblatt.Dan@epa.gov)>  
**Subject:** Tolfenpyrad

I have a general with Rick tomorrow morning – what is the status of CA's request to add to the label?

Michael L. Goodis, P.E.  
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